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ORIGINAL

Before the  
Federal Communications Commission  
Washington, D.C. 20554

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In the Matter of )  
 )  
Amendment of Section 73.202(b) ) MM Docket No.  
FM Table of Allotments ) RM-  
To Reserve Channel 252C2 )  
Columbia, Missouri )

NOV 21 2003

Federal Communication Commission  
Bureau / Office

To: Chief, Allocations Branch  
Policy and Rules Division  
Mass Media Bureau

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NOV 24 2003

Federal Communications Commission  
Office of the Secretary

PETITION FOR RULE MAKING

The Curators of the University of Missouri (the "University"), by its attorneys and pursuant to the Public Notice, DA 03-2990, released September 30, 2003 and Section 1.401 of the Commission's rules, hereby petitions the Commission to reserve Channel 252C2 at Columbia, Missouri for noncommercial educational ("NCE") use.

I. Background

In the September 30 Public Notice, the Commission announced that the Media Bureau was opening a window to permit noncommercial educational reservation showings for certain vacant FM allotments. Attachment A to the Public Notice, which identified the pertinent vacant FM allotments included Channel 252C2 at Columbia, Missouri. The Notice stated that a party must file a Petition for Rule Making to amend the FM Table of Allotments on or before November 21, 2003.

On October 30, 2003, the University filed a Petition to Rescind the Public Notice. The Petition to Rescind argued that the Public Notice was based on certain actions taken by the Commission in its *Second Report and Order in the Matter of Reexamination of the Comparative*

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List A  
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*Standard for Noncommercial Educational Applicants*, FCC 03-44, released April 10, 2003 (the “*Second Report and Order*”), and that the Commission had not yet considered petitions for reconsideration of the *Second Report and Order*. The University’s petition for reconsideration had argued that the reservation standards were impossible to meet in many communities, thus making the possible reservation of channels largely fictitious. The Petition to Rescind further argued that the Commission’s instructions concerning the reservation showing were contradictory and arbitrary.

To date, the Commission has not acted on either the Petition to Rescind or the Petitions for Reconsideration of the *Second Report and Order*. Accordingly, the University is filing this Petition for Rule Making which seeks to reserve Channel 252C2 at Columbia, Missouri for noncommercial educational use.

## II. *Channel 252C2 at Columbia, Missouri Should Be Reserved for NCE Use*

The University requests that the Commission initiate a rule making proceeding to amend Section 73.202(b) of its rules, the FM Table of Allotments, to reserve Channel 252C2 at Columbia, Missouri for NCE use at coordinates 38-57-21 N-Lat. and 92-16-24 W-Long. Thus, the University requests the following change in the FM Table of Allotments:

	<b>Current</b>	<b>Proposed</b>
Columbia, MO	244C1, 252C2, 268C1, 272A	244C1, *252C2, 268C1, 272A

As set forth in the attached Engineering Statement, Channel 252C2 complies with the reservation criteria set forth by the Commission in the *Second Report and Order* with one exception.<sup>1</sup> While the proposal will provide a second service to a sizeable population of 22,095,

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<sup>1</sup> See *Second Report and Order*, at ¶ 34-40.

statistically that population comprises 7.32% rather than 10% of the service area. The University respectfully requests that the percentage element of the reservation criteria be waived.

### III. There is Good Cause for Grant of the Waiver Request

The Commission may waive its rules for “good cause.”<sup>2</sup> In the instant case, the proposed noncommercial allocation and station will provide valued NCE service to a population of 301,506 and provide a second NCE service to nearly 10% of that population. None of the non-reserved channels in Columbia are allocated to NCE stations,<sup>3</sup> and as demonstrated in the attached engineering analysis, “there are no channels available to establish an NCE station that would provide any amount of service within the proposed allocation’s 1mV/m coverage area.”

*See Engineering Statement.*

Moreover, as the University has explained in other proceedings, the Commission’s spectrum reservation test is extraordinarily difficult to satisfy, especially for a Class C2 station, and essentially bars new NCE stations from non-reserved spectrum.<sup>4</sup> The Commission has not explained how it arrived at a 10% threshold or why only first or second NCE services are relevant in satisfying that threshold. For these reasons, there is good cause for grant of the requested waiver.

### IV. The University Intends to Apply for the Channel, If Reserved

If Channel 252C2 is reserved at Columbia, Missouri, the University intends to apply for the channel, and, if authorized, intends to construct and operate a new NCE FM station. The

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<sup>2</sup> See 47 C.F.R. § 1.3; see also *WAIT Radio v. FCC*, 418 F.2d 1153 (D.C. Cir. 1969).

<sup>3</sup> See 47 C.F.R. § 73.202(b).

<sup>4</sup> See The Curators of the University of Missouri, Petition for Reconsideration, MM Docket No. 95-31 (June 16, 2003).

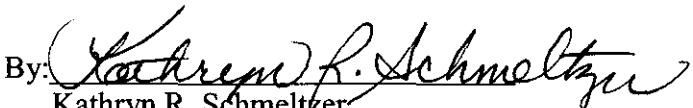
University has already been approved as a NCE licensee and currently operates six NCE FM stations in the State of Missouri.

V. Conclusion

In sum, reservation of Channel 252C2 at Columbia, Missouri will serve the public interest. Accordingly, the University respectfully requests that the Commission grant the requested waiver and reserve Channel 252C2 at Columbia, Missouri for NCE use.

Respectfully submitted,

THE CURATORS OF  
THE UNIVERSITY OF MISSOURI

By:   
Kathryn R. Schmeltzer  
Tony Lin  
Its Attorneys

Shaw Pittman LLP  
2300 N Street, N.W.  
Washington, D.C. 20037-1128  
(202) 663-8000

### **Certificate of Service**

I hereby certify that, on this 21<sup>st</sup> day of November 2003, a true and correct copy of the foregoing Petition for Rulemaking was sent via first-class U.S. mail to the following:

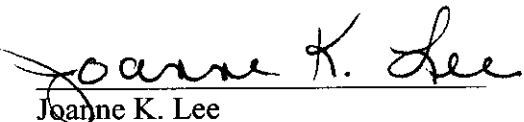
Rolanda F. Smith\*  
Federal Communications Commission  
Audio Division, Room 2-B450  
445 12th Street SW  
Washington, DC 20554

Mark N Lipp, Esq.  
Vinson & Elkins, L.L.P.  
The Willard Office Building  
1455 Pennsylvania Avenue, NW  
Washington, DC 20004-1008

J. Brian DeBoice, Esq.  
Cohn and Marks  
1920 N. Street, NW, Suite 300  
Washington, DC 20036

Bruce McGuire, Esq.  
Smith & McGuire  
413 Georgia Lane  
Louisiana, MO 63353

Barry D. Umansky, Esq.  
Irwin Campbell & Tannenbaum, PC  
1730 Rhode Island Avenue, NW  
Suite 200  
Washington, DC 20036

  
Joanne K. Lee  
Joanne K. Lee

\* By Hand Delivery

**Attachment**  
**Engineering Statement**



November 20, 2003

**Engineering Statement**  
**On Behalf of the Curators of the University of Missouri**

We have been asked by the Curators of the University of Missouri, (Columbia) to prepare an engineering study with regard to the channel 252 class C2 allocation at Columbia, Missouri, using the methodology expressed in MM Docket No. 95-31.

The reader will find two maps included as attachment A and B. Attachment A defines the site locations of the NCE channel preclusion studies. Attachment B, is a map showing all first (white area) and second (gray area) NCE service areas within the 1 mV/m reference contour of the allocation at full facilities. This map considers all existing area NCE stations, LPFM stations and AM stations operating as "educational." The map shows that there is no white area and that the gray area amounts to 22,095 people. Since the C2 allocation's 1 mV/m is predicted to serve of 301,563 people, using the US year 2000 census, the 22,095 people receiving a gray area NCE service represent 7.32 percent.

Five NCE frequency searches were carried out using the site coordinates established in the attachment A map. Attachments C, D, E and F are channel by channel preclusion studies carried out using the maximum class C2 ERP and antenna height. These studies show that there are no channels available at the periphery of the proposed allocation's predicted 1 mV/m coverage. Attachment G is a channel-by-channel preclusion search, using minimum class facilities, that shows that there are no minimum class NCE channels available at the principal city coordinates.

We, therefore, conclude that there are no channels available to establish an NCE station that would provide any amount of service within the proposed allocation's 1 mV/m coverage area.

Doug Vernier

**Declaration:**

I, Douglas L. Vernier, declare that I have received training as an engineer from the University of Michigan School of Engineering. That, I have received degrees from the University in the field of Broadcast Telecommunications. That, I have been active in broadcast consulting for over 30 years;

That, I have held a Federal Communications Commission First Class Radiotelephone License continually since 1964. In 1985, this license was reissued by the Commission as a lifetime General Radiotelephone license no. PG-16-16464;

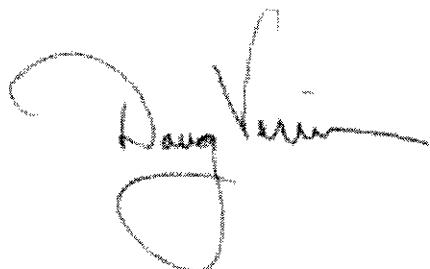
That, I am certified as a Professional Broadcast Engineer (#50258) by the Society of Broadcast Engineers, Indianapolis, Indiana. (Re-certified 10/2000.)

That, my qualifications are a matter of record with the Federal Communications Commission;

That, I have been retained by the Curators of the University of Missouri (Columbia) to prepare the engineering showings appended hereto:

That, I have prepared these broadcast engineering showings, the technical information contained in same and the facts stated within are true of my knowledge;

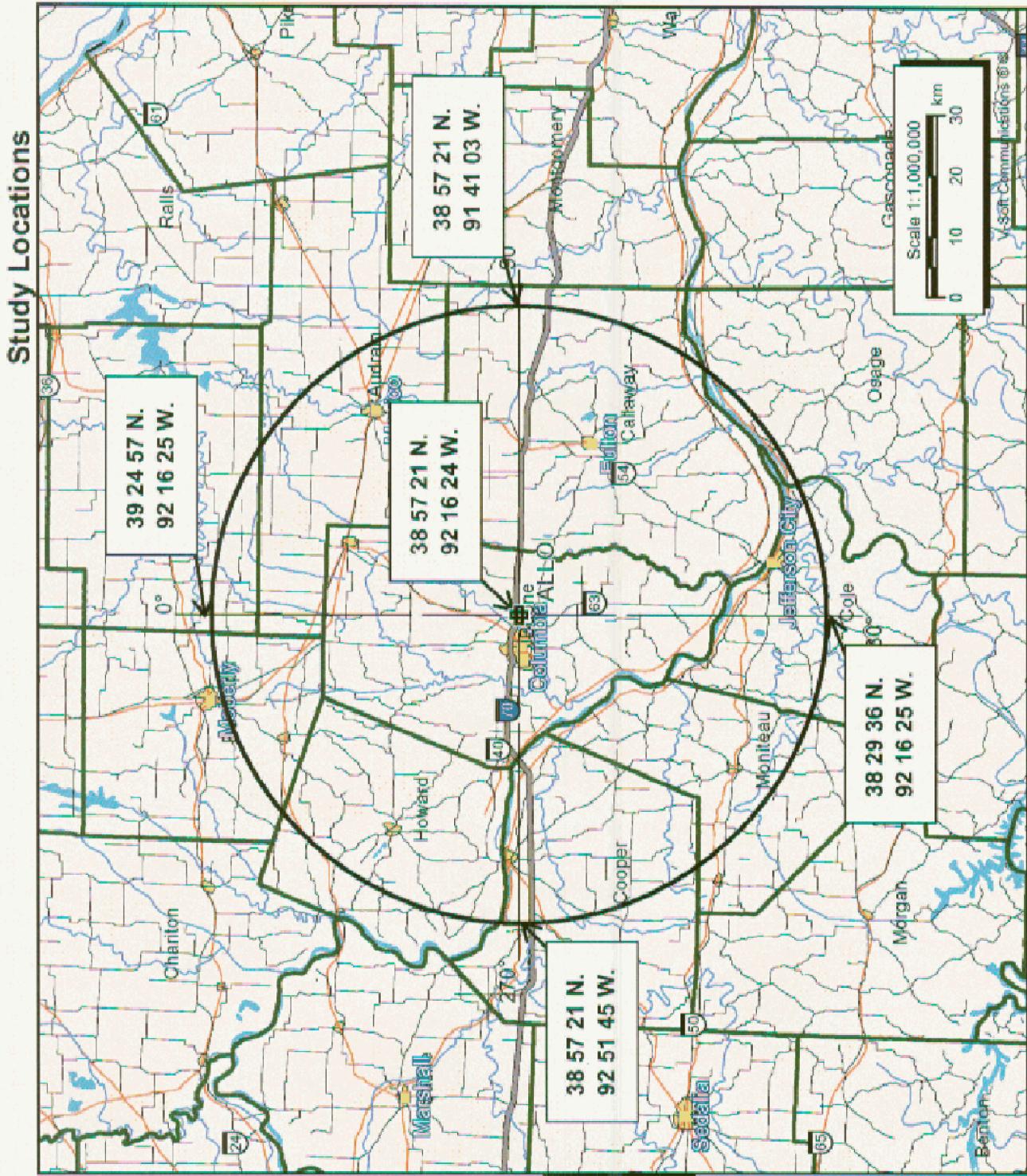
That, under penalty of perjury, I declare that the foregoing is correct.

A handwritten signature in black ink, appearing to read "Douglas L. Vernier". The signature is fluid and cursive, with a large, stylized 'D' at the beginning.

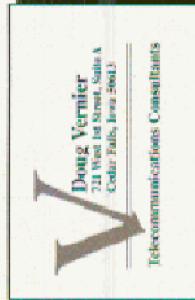
Douglas L. Vernier

Executed on November 20, 2003

**Attachment A**

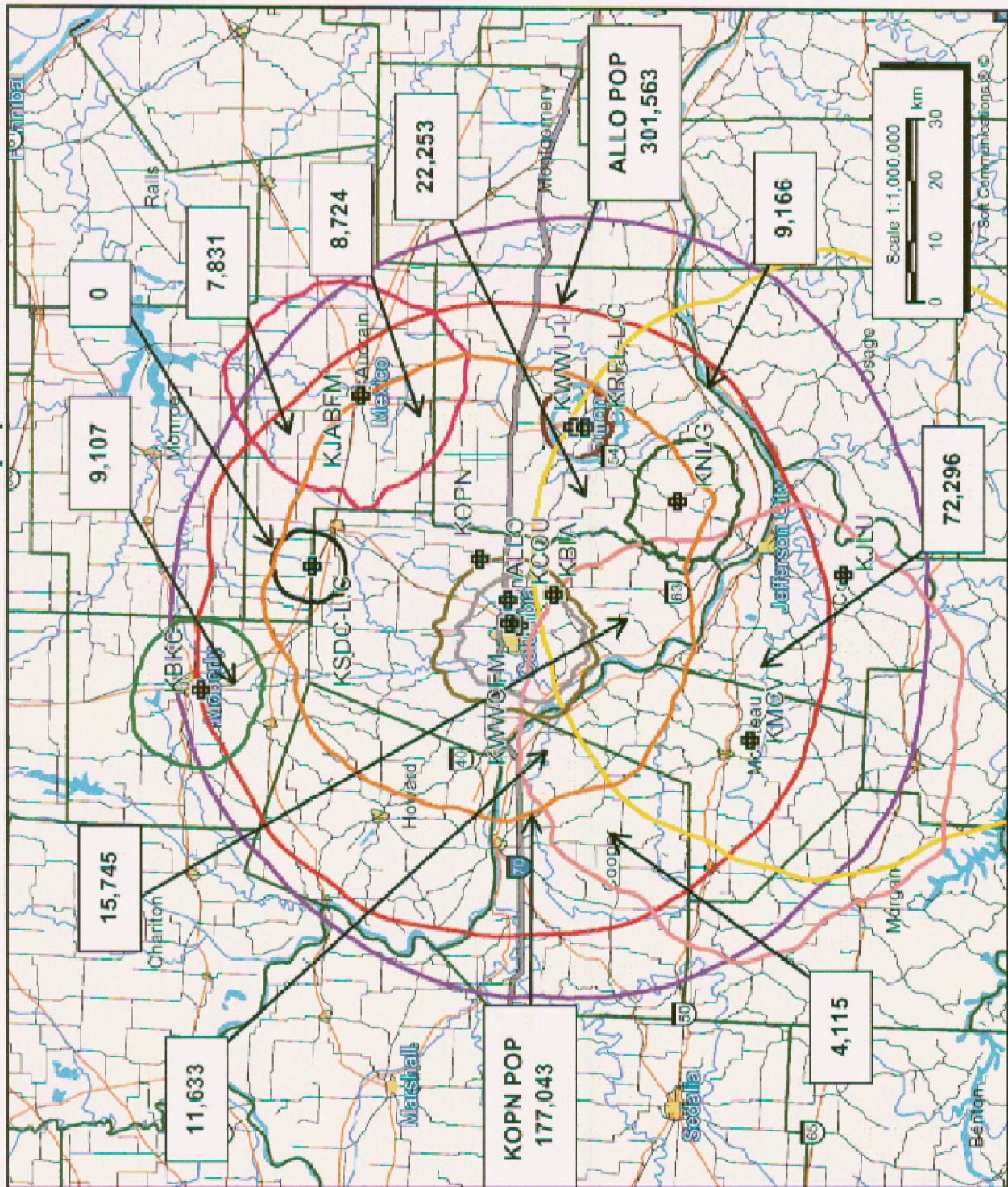


ALLO C2  
Columbia, MO  
Latitude: 38-57-21 N  
Longitude: 092-16-24 W  
ERP: 50.00 kW  
Channel: 252  
Frequency: 98.3 MHz  
AMSL Height: 393 m  
HAAT = 150 m  
Horiz. Pattern: Omni  
Vert. Pattern: No  
Prop Model: FCC



**Attachment B**

**2nd Service population = 22,095 or 7.32%**



**ALLO**

Latitude: 38-57-21 N  
Longitude: 092-16-24 W  
ERP: 50.00 kW  
Channel: 252  
Frequency: 98.3 MHz  
AMSL Height: 383.44 m  
HAAT Used = 150m  
Elevation: 224.42 m  
Horiz. Pattern: Omni  
Vert. Pattern: No  
Prop Model: FCC

ALLO	KBCK	KSDC-L.C.	KJABFM	KOPN	KWCFM	KRWWU-L	KRFL-L.C.	KNGL	KJUL	KBIA	KMGV
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**V**  
Dong Vernier  
72 West 1st Street, Suite A  
Corte Madera, CA 94131  
Telecommunications Consultants

**Attachment C**

Doug Vernier Telecommunications Consultants  
721 W. First St., Suite A, Cedar Falls, IA 50613

CHANNEL PRECLUSION STUDY  
University of Missouri, Columbia  
Zero Degree Site Search

REFERENCE 38 24 57 N DISPLAY DATES  
38 24 57 N DATA 11-20-03  
92 16 25 W SEARCH 11-20-03

Class= C2, Pwr= 50 kW, HAAT= 150 M, COR= 366 M  
Average Protected F(50-50)= 52.2 km  
Ave. F(50-10) 40 dBu= 137.7 54 dBu= 78.1 80 dBu= 19.9 100 dBu= 6.0

CH CITY	CALL	TYPE STATE	AZI. DIST <-- FILE #	LAT. LNG.	Pwr(kW) HAAT(M)	COR(M) INT(km)	PRO(km)	LICENSEE	*IN* (Overlap in km)	*OUT*
<b>--- Channel 201 88.1 MHz. ---</b>										
201A KCOU Columbia		LIC MO	HN 355.9 175.9 BLED1587	38 56 23 92 19 20	0.430 47	260 137.8	10.3	The Curators Of The Univer	-28.93	-89.78
201C1 KDHX St. Louis		LIC MO	CN 89.4 269.4 BLED19880401KA	38 25 01 90 25 59	42.000 210	401 140.6	56.6	Double Helix Corporation	-35.46	-36.46
201A KYRV Concordia		LIC MO	VN 294.9 114.9 BLED19971223KC	38 52 10 93 32 58	1.000 49	291 136.3	12.8	Full Smile Inc	24.94	-27.13
Vertical Polarization Only										
202A KJABFM Mexico		APP MO	VX 23.2 203.2 BPED20030930AHQ	39 06 13 91 53 35	4.800 75	332 79.9	23.5	Mexico Educational	-6.08	-20.18
202A KJABFM Mexico		LIC MO	CN 21.4 201.4 BLED19990406KA	39 10 24 91 53 22	6.000 28	281 79.9	15.8	Mexico Educational	13.21	-5.22
<b>--- Channel 202 88.3 MHz. ---</b>										
202A KJABFM Mexico		APP MO	VX 23.2 203.2 BPED20030930AHQ	39 06 13 91 53 35	4.800 75	332 139.4	23.5	Mexico Educational	-48.96	-79.67
202A KJABFM Mexico		LIC MO	CN 21.4 201.4 BLED19990406KA	39 10 24 91 53 22	6.000 28	281 139.4	15.8	Mexico Educational	-31.63	-64.72
203C1 KUMR Rolla		LIC MO	CX 144.8 324.8 BMLED20020910AAD	37 47 56 91 43 28	100.000 177	471 78.9	61.6	University of Missouri	-60.94	-56.86
205C2 KJLU Jefferson City		LIC MO	CN 41.7 221.7 BLED19951215KB	38 27 29 92 13 32	29.500 173	386 5.9	50.2	Lincoln University of Miss	-51.37*	-49.87*
201A KCOU Columbia		LIC MO	HN 355.9 175.9 BLED1587	38 56 23 92 19 20	0.430 47	260 78.2	10.3	The Curators Of The Univer	-8.27	-30.18
202C3 KWND Springfield		LIC MO	CN 206.3 26.3 BLED19930802KB	37 10 30 93 02 35	12.000 107	526 137.4	34.4	Radio Training Network, In	2.16	-18.32
<b>--- Channel 203 88.5 MHz. ---</b>										
203C1 KUMR Rolla		LIC MO	CX 144.8 324.8 BMLED20020910AAD	37 47 56 91 43 28	100.000 177	471 138.5	61.6	University Of Missouri	-128.27	-116.40
205C2 KJLU Jefferson City		LIC MO	CN 41.7 221.7 BLED19951215KB	38 27 29 92 13 32	29.500 173	386 5.9	50.2	Lincoln University of Miss	-51.37*	-49.87*
202A KJABFM Mexico		APP MO	VX 23.2 203.2 BPED20030930AHQ	39 06 13 91 53 35	4.800 75	332 79.9	23.5	Mexico Educational	-6.08	-20.18
202A KJABFM Mexico		LIC MO	CN 21.4 201.4 BLED19990406KA	39 10 24 91 53 22	6.000 28	281 79.9	15.8	Mexico Educational	13.21	-5.22
257C2 KCLRFM Boonville		LIC MO	CN 329.5 149.5 BLH19900906KA	38 46 34 92 32 45	33.000 202	405 59.0	53.7	Zimmer Radio Of Mid-missou	20.0R	26.5M
<b>--- Channel 204 88.7 MHz. ---</b>										
205C2 KJLU Jefferson City		LIC MO	CN 41.7 221.7 BLED19951215KB	38 27 29 92 13 32	29.500 173	386 78.0	50.2	Lincoln University Of Miss	-119.97*	-121.93*
203C1 KUMR Rolla		LIC MO	CX 144.8 324.8 BMLED20020910AAD	37 47 56 91 43 28	100.000 177	471 78.9	61.6	University Of Missouri	-60.94	-56.86
257C2 KCLRFM Boonville		LIC MO	CN 329.5 149.5 BLH19900906KA	38 46 34 92 32 45	33.000 202	405 59.0	53.7	Zimmer Radio Of Mid-missou	27.0R	19.5M

CH CITY	CALL	TYPE	STATE	AZI.	DIST	FILE #	LAT.	Pwr(kw)	COR(M)	PRO(km)	*IN*	Page # 2	*OUT*
				<--			LNG.	HAAT(M)	INT(km)	LICENSEE	(Overlap in km)		
--- Channel 205 88.9 MHz. ---													
205C2 KJLU Jefferson City	LIC MO	CN	41.7 221.7	6.29 BLED19951215KB	38 27 29 92 13 32	29.500 173	386 137.6	50.2 Lincoln University of Miss	-174.86*	-181.54*			
206C KWFC Springfield	LIC MO	DCY	203.7 23.7	147.07 BLED19980501KA	37 12 06 92 56 33	53.290 341	782 78.2	69.0 Baptist Bible College, Inc	-5.75	-0.15			
From Channel 206C1-Amended			971017										
205C2 KSEF-C Farmington	CP MO	DCN	114.0 294.0	164.88 BPED19980306MC	37 48 04 90 33 44	1.849 210	483 140.3	30.3 Board of Regents, Southeas	25.35	-5.70			
--- channel 206 89.1 MHz. ---													
205C2 KJLU Jefferson City	LIC MO	CN	41.7 221.7	6.29 BLED19951215KB	38 27 29 92 13 32	29.500 173	386 78.0	50.2 Lincoln University of Miss	-119.97*	-121.93*			
206C KWFC Springfield	LIC MO	DCY	203.7 23.7	147.07 BLED19980501KA	37 12 06 92 56 33	53.290 341	782 137.8	69.0 Baptist Bible College, Inc	-66.90	-59.74			
From Channel 206C1-Amended			971017										
206C2 KCLC St. Charles	LIC MO	DC	74.5 254.5	159.72 BLED20000720AAH	38 47 05 90 30 05	35.000 55	214 140.7	32.4 Lindenwood College	-8.48	-13.39			
--- channel 207 89.3 MHz. ---													
208C2 KOPN Columbia	LIC MO	CN	5.9 185.9	64.98 BLED19930203KA	38 59 53 92 11 48	36.000 62	325 79.6	34.4 New Wave Corporation	-44.93	-49.06			
205C2 KJLU Jefferson City	LIC MO	CN	41.7 221.7	6.29 BLED19951215KB	38 27 29 92 13 32	29.500 173	386 5.9	50.2 Lincoln University of Miss	-51.37*	-49.87*			
206C KWFC Springfield	LIC MO	DCY	203.7 23.7	147.07 BLED19980501KA	37 12 06 92 56 33	53.290 341	782 78.2	69.0 Baptist Bible College, Inc	-5.75	-0.15			
From Channel 206C1-Amended			971017										
210C3 KMCV High Point	LIC MO	V	311.2 131.2	30.58 BLED20010607AAA	38 35 48 92 32 17	18.000 106	338 5.8	37.4 Community Broadcasting, In	-24.66*	-12.67*			
207C1 KCURFM Kansas City	LIC MO	CN	291.9 111.9	205.64 BMLED19920728KC	39 04 59 94 28 49	100.000 238	512 136.3	67.3 Curators Of University Of	-11.29	2.00			
261C2 KBBM Jefferson City	LIC MO	CN	316.0 136.0	16.69 BLH19910606KE	38 31 25 92 24 25	33.000 191	409 58.9	52.9 Premier Radio Group	15.0R	1.7M			
--- Channel 208 89.5 MHz. ---													
208C2 KOPN Columbia	LIC MO	CN	5.9 185.9	64.98 BLED19930203KA	38 59 53 92 11 48	36.000 62	325 139.1	34.4 New Wave Corporation	-104.00	-108.57			
205C2 KJLU Jefferson City	LIC MO	CN	41.7 221.7	6.29 BLED19951215KB	38 27 29 92 13 32	29.500 173	386 5.9	50.2 Lincoln University of Miss	-51.37*	-49.87*			
209A KMNR Rolla	LIC MO	CN	139.4 319.4	67.81 BLED19890531KA	37 57 07 91 46 12	0.450 122	394 78.6	16.7 Curators Of The Univ. Of M	-9.68	-27.49			
210C3 KMCV High Point	LIC MO	V	311.2 131.2	30.58 BLED20010607AAA	38 35 48 92 32 17	18.000 106	338 5.8	37.4 Community Broadcasting, In	-24.66*	-12.67*			
208A KNLH Cedar Hill	LIC DC MO	DC	91.8 271.8	150.86 BLED19981020KA	38 21 40 90 32 54	0.068 222	401 140.3	13.9 New Life Evangelistic Cent	50.21	-3.34			
261C2 KBBM Jefferson City	LIC MO	CN	316.0 136.0	16.69 BLH19910606KE	38 31 25 92 24 25	33.000 191	409 58.9	52.9 Premier Radio Group	15.0R	1.7M			
--- channel 209 89.7 MHz. ---													
209A KMNR Rolla	LIC MO	CN	139.4 319.4	67.81 BLED19890531KA	37 57 07 91 46 12	0.450 122	394 138.2	16.7 Curators Of The Univ. Of M	-39.34	-87.05			
210C3 KMCV High Point	LIC MO	V	311.2 131.2	30.58 BLED20010607AAA	38 35 48 92 32 17	18.000 106	338 77.2	37.4 Community Broadcasting, In	-78.12*	-84.06*			
208C2 KOPN Columbia	LIC MO	CN	5.9 185.9	64.98 BLED19930203KA	38 59 53 92 11 48	36.000 62	325 79.6	34.4 New Wave Corporation	-44.93	-49.06			

CH CITY	CALL	TYPE STATE	AZI. <--	DIST FILE #	LAT. LNG.	Pwr(kw) HAAT(M)	COR(M) INT(km)	PRO(km) LICENSEE	Page # 3	
									*IN*	*OUT* (Overlap in km)
209A Knob Noster	KCVQ	LIC MO	294.9 114.9	121.96 BLED19980714KA	38 52 10 93 32 58	5.000 54	296 136.3	20.5 Lake Area Educ.	-2.98 B/casting	-34.76
209C3 Bowling Green	981020	APP MO	40.7 220.7	136.72 BPED19981020MC	39 20 37 91 14 15	9.000 91	314 137.4	29.7 New Life Evangelistic Cent	-6.92	-30.38
209A Troy	980126	APP MO	57.9 237.9	132.91 BPED19980126MC	39 02 36 90 58 19	3.500 81	266 139.1	22.7 Missouri River Christian B	4.80	-28.88
Returned 980617-Amended Directional Pattern 980716.										
209A Potosi	KNLP	LIC MO	111.9 291.9	142.66 BLED19980622KB	37 55 42 90 46 02	2.300 84	367 140.7	20.9 New Life Evangelistic Cent	19.24	-18.87
212A New Bloomfield	KNLG	LIC MO	26.5 206.5	35.86 BLED19970730KB	38 42 16 92 05 20	0.150 74	286 6.2	9.8 New Life Evangelistic Cent	-19.03*	19.77
212A Sunrise Beach	KCRL	LIC MO	245.6 65.6	47.26 BLED19980909KB	38 14 22 92 45 56	4.500 62	295 5.5	21.2 Community Broadcasting Inc	-3.80*	20.53
Vertical Polarization Only										
--- Channel 210 89.9 MHz. ---										
210C3 High Point	KMCV	LIC MO	311.2 131.2	30.58 BLED20010607AAA	38 35 48 92 32 17	18.000 106	338 136.9	37.4 Community Broadcasting, In	-128.04*	-143.74*
210A Washington	KGNV	LIC MO	78.4 258.4	103.92 BLED19901217KD	38 35 49 91 06 17	1.000 81	245 140.8	16.4 Missouri River Christian B	-7.23	-53.29
209A Rolla	KMNR	LIC MO	139.4 319.4	67.81 BLED19890531KA	37 57 07 91 46 12	0.450 122	394 78.6	16.7 Curators of The Univ. Of M	-9.68	-27.49
210C3 Cabool	KFFW.C	CP MO	172.4 352.4	148.19 BMPED20011002ACJ	37 05 32 92 03 10	10.500 163	546 141.2	40.1 First Freewill Baptist	-12.43	-33.12
212A New Bloomfield	KNLG	LIC MO	26.5 206.5	35.86 BLED19970730KB	38 42 16 92 05 20	0.150 74	286 6.2	9.8 New Life Evangelistic Cent	-19.03*	19.77
212A Sunrise Beach	KCRL	LIC MO	245.6 65.6	47.26 BLED19980909KB	38 14 22 92 45 56	4.500 62	295 5.5	21.2 Community Broadcasting Inc	-3.80*	20.53
Vertical Polarization Only										
--- Channel 211 90.1 MHz. ---										
210C3 High Point	KMCV	LIC MO	311.2 131.2	30.58 BLED20010607AAA	38 35 48 92 32 17	18.000 106	338 77.2	37.4 Community Broadcasting, In	-78.12*	-84.06*
212A New Bloomfield	KNLG	LIC MO	26.5 206.5	35.86 BLED19970730KB	38 42 16 92 05 20	0.150 74	286 80.2	9.8 New Life Evangelistic Cent	-31.87*	-54.21
212A Sunrise Beach	KCRL	LIC MO	245.6 65.6	47.26 BLED19980909KB	38 14 22 92 45 56	4.500 62	295 74.4	21.2 Community Broadcasting Inc	-33.04*	-48.41
211A Moberly	KBKC	LIC MO	352.4 172.4	111.47 BLED20011109AAB	39 24 39 92 26 46	0.250 64	325 137.8	10.4 American Family Associatio	23.90	-36.82
211C3 Springfield	KSCV.C	CP MO	212.0 32.0	146.53 BPED20010126ABB	37 17 41 93 09 10	9.000 165	551 136.9	39.1 Community Broadcasting, In	-7.77	-29.41
211C3 Springfield	KSCV	LIC MO	205.9 25.9	151.61 BLED19990222KC	37 11 10 93 01 23	5.500 156	579 137.4	34.1 Community Broadcasting, In	5.94	-19.86
212C3 Cuba	KGNNFM	LIC MO	113.2 293.2	92.07 BLED19981123KA	38 05 11 91 18 30	6.300 77	362 81.1	25.3 Mo River Christian B/casti	-1.52	-14.30
265A Osage Beach	RADD	ADD MO	225.9 45.9	40.13 rfsmith 5/7/02: App. for review denied on 3/25/02	38 09 52 92 36 12	6.000 108	329 58.1	29.3 Recon filed on 4/24/02.	15.0R	25.1M
265A Osage Beach	RADD	ADD MO	227.6 47.6	47.89 rfsmith 5/7/02: App. for review denied on 3/25/02	38 07 29 92 40 39	6.000 113	332 58.0	30.0 Recon filed on 4/24/02	15.0R	32.9M

CH CITY	CALL	TYPE	STATE	AZI.	DIST	LAT.	Pwr(kw)	COR(M)	PRO(km)	*IN*	*OUT*
				<--	FILE #	LNG.	HAAT(m)	INT(km)	LICENSEE	(Overlap in km)	
--- Channel 212 90.3 MHZ. ---											
212A KNLG New Bloomfield	LIC MO	CN	26.5 206.5	35.86 BLED19970730KB	38 42 16 92 05 20	0.150 74	286 139.7	9.8 New Life Evangelistic Cent	-51.03*	-113.70	
212A KCRL Sunrise Beach Vertical Polarization Only	LIC MO	VN	245.6 65.6	47.26 BLED19980909KB	38 14 22 92 45 56	4.500 62	295 134.5	21.2 Community Broadcasting Inc	-76.06*	-108.48	
212C3 KGNNFM Cuba	LIC MO	C	113.2 293.2	92.07 BLED19981123KA	38 05 11 91 18 30	6.300 77	362 140.5	25.3 Mo River Christian B/casti	-45.95	-73.76	
212B WQUB Quincy From channel 212B1	LIC IL	CN	23.7 203.7	187.29 BLED19970916KF	39 57 22 91 23 22	28.000 156	300 139.5	47.8 Quincy University Corporat	7.83	-0.01	
213A KWWCFM Columbia	APP MO	CX	356.3 176.3	59.70 BPED20010521ABX	38 57 09 92 19 05	1.500 49	264 78.2	14.2 Stephens College	-13.78	-32.71	
213A KWWCFM Columbia	LIC MO	CN	356.3 176.3	59.79 BLED19820715AE	38 57 12 92 19 05	1.250 44	259 78.2	12.9 Stephens College	-11.52	-31.30	
215C3 KNLN Vienna	LIC MO	DC	152.2 332.2	28.25 BLED20000606ACF	38 11 27 92 07 22	0.558 126	352 6.4	18.0 New Life Evangelistic Cent	-28.09*	3.91	
210C3 KMVC High Point	LIC MO	V	311.2 131.2	30.58 BLED20010607AAA	38 35 48 92 32 17	18.000 106	338 5.8	37.4 Community Broadcasting, In	-24.66*	-12.67*	
265A RADD Osage Beach	ADD MO		225.9 45.9	40.13	38 09 52 92 36 12	6.000 108	329 58.1	29.3	15.0R	25.1M	
265A RADD Osage Beach	ADD MO		227.6 47.6	47.89	38 07 29 92 40 39	6.000 113	332 58.0	30.0	15.0R	32.9M	
rfsmith 5/7/02: App. for review denied on 3/25/02 - Recon filed on 4/24/02.											
--- channel 213 90.5 MHZ. ---											
213A KWWCFM Columbia	APP MO	CX	356.3 176.3	59.70 BPED20010521ABX	38 57 09 92 19 05	1.500 49	264 137.8	14.2 Stephens College	-45.09	-92.30	
213A KWWCFM Columbia	LIC MO	CN	356.3 176.3	59.79 BLED19820715AE	38 57 12 92 19 05	1.250 44	259 137.8	12.9 Stephens College	-39.71	-90.90	
212A KNLG New Bloomfield	LIC MO	CN	26.5 206.5	35.86 BLED19970730KB	38 42 16 92 05 20	0.150 74	286 80.2	9.8 New Life Evangelistic Cent	-31.87*	-54.21	
212A KCRL Sunrise Beach Vertical Polarization Only	LIC MO	VN	245.6 65.6	47.26 BLED19980909KB	38 14 22 92 45 56	4.500 62	295 74.4	21.2 Community Broadcasting Inc	-33.04*	-48.41	
215C3 KNLN Vienna	LIC MO	DC	152.2 332.2	28.25 BLED20000606ACF	38 11 27 92 07 22	0.558 126	352 6.4	18.0 New Life Evangelistic Cent	-28.09*	3.91	
210C3 KMVC High Point	LIC MO	V	311.2 131.2	30.58 BLED20010607AAA	38 35 48 92 32 17	18.000 106	338 5.8	37.4 Community Broadcasting, In	-24.66*	-12.67*	
212C3 KGNNFM Cuba	LIC MO	C	113.2 293.2	92.07 BLED19981123KA	38 05 11 91 18 30	6.300 77	362 81.1	25.3 Mo River Christian B/casti	-1.52	-14.30	
214C3 KTTK Lebanon	LIC MO	CN	206.0 26.0	96.69 BLED19970627KF	37 37 58 92 45 22	11.000 151	517 77.8	39.2 Lebanon Educational Broadc	-13.62	-20.30	
From Channel 210A											
--- channel 214 90.7 MHZ. ---											
215C3 KNLN Vienna	LIC MO	DC	152.2 332.2	28.25 BLED20000606ACF	38 11 27 92 07 22	0.558 126	352 81.1	18.0 New Life Evangelistic Cent	-53.06*	-70.84	
214C3 KTTK Lebanon	LIC MO	CN	206.0 26.0	96.69 BLED19970627KF	37 37 58 92 45 22	11.000 151	517 137.4	39.2 Lebanon Educational Broadc	-59.86	-79.93	
214C1 KWMU St. Louis	LIC MO	C	83.2 263.2	170.61 BLED20010706AAR	38 34 50 90 19 45	100.000 273	444 140.2	The Curators Of The Univer	-53.24	-39.76	

CH CITY	CALL	TYPE STATE	AZI. <--	DIST FILE #	LAT. LNG.	Pwr(kW) HAAT(M)	COR(M) INT(km)	PRO(km)	*IN* LICENSEE	*OUT* (Overlap in km)	Page # 5
213A Columbia	KWWCFM	APP MO	356.3 176.3	59.70 BPED20010521ABX	38 57 09 92 19 05	1.500 49	264 78.2	14.2 Stephens	-13.78 College	-32.71	
213A Columbia	KWWCFM	LIC MO	356.3 176.3	59.79 BLED19820715AE	38 57 12 92 19 05	1.250 44	259 78.2	12.9 Stephens	-11.52 College	-31.30	
217C1 Columbia	KBIA	LIC MO	1.0 181.0	52.40 BLED959	38 53 16 92 15 48	100.000 175	425 6.1	61.4 University Of Missouri	-8.43* -15.15*		
214C1 Kirksville	KHGN.C	CP MO	353.5 173.5	202.69 BPED20000309ABD	40 13 46 92 32 38	100.000 131	415 137.7	55.9 Care Broadcasting, Inc	-1.21	9.09	
212A New Bloomfield	KNLG	LIC MO	26.5 206.5	35.86 BLED19970730KB	38 42 16 92 05 20	0.150 74	286 6.2	9.8 New Life Evangelistic Cent	-19.03*	19.77	
212A Sunrise Beach	KCRL	LIC MO	245.6 65.6	47.26 BLED19980909KB	38 14 22 92 45 56	4.500 62	295 5.5	21.2 Community Broadcasting Inc	-3.80*	20.53	
Vertical Polarization Only											

--- Channel 215 90.9 MHZ. ---

215C3 Vienna	KNLN	LIC MO	152.2 332.2	28.25 BLED20000606ACF	38 11 27 92 07 22	0.558 126	352 140.6	18.0 New Life	-83.99* Evangelistic	-130.30	
215C1 Warrensburg	KTBG	LIC MO	293.6 113.6	146.12 BLED19981112KB	38 55 54 93 49 06	97.000 142	383 136.4	57.1 Central Missouri	-57.37 State Uni	-47.31	
217C1 Columbia	KBIA	LIC MO	1.0 181.0	52.40 BLED959	38 53 16 92 15 48	100.000 175	425 6.1	61.4 University Of Missouri	-8.43* -15.15*		
214C3 Lebanon	KTTK	LIC MO	206.0 26.0	96.69 BLED19970627KF	37 37 58 92 45 22	11.000 151	517 77.8	39.2 Lebanon Educational Broadc	-13.62	-20.30	
From Channel 210A											
212A New Bloomfield	KNLG	LIC MO	26.5 206.5	35.86 BLED19970730KB	38 42 16 92 05 20	0.150 74	286 6.2	9.8 New Life Evangelistic Cent	-19.03*	19.77	
212A Sunrise Beach	KCRL	LIC MO	245.6 65.6	47.26 BLED19980909KB	38 14 22 92 45 56	4.500 62	295 5.5	21.2 Community Broadcasting Inc	-3.80*	20.53	
Vertical Polarization Only											

--- Channel 216 91.1 MHZ. ---

217C1 Columbia	KBIA	LIC MO	1.0 181.0	52.40 BLED959	38 53 16 92 15 48	100.000 175	425 79.2	61.4 University of Missouri	-92.22* -88.22*		
215C3 Vienna	KNLN	LIC MO	152.2 332.2	28.25 BLED20000606ACF	38 11 27 92 07 22	0.558 126	352 81.1	18.0 New Life	-53.06* Evangelistic	-70.84	
216C2 Park Hills	KBGM	LIC MO	114.0 294.0	164.72 BLED20010524AAE	37 48 04 90 33 51	8.000 206	479 140.3	41.6 American Family Associa	4.13	-17.24	
216C2 Springfield	KSMU	LIC MO	214.0 34.0	166.30 BLED19930610KC	37 10 14 93 19 25	40.000 109	503 136.7	44.4 Bd Of Regents For Sw Mo St	-11.76	-14.78	
270C2 RADD	RADD	ADD MO	241.1 61.1	31.12	38 16 49 92 35 07	50.000 152	387 58.1	52.5	15.0R	16.1M	
Eldon											
270A Eldon	AP270	APP MO	253.1 73.1	29.03 BIPH20010724ADA	38 20 23 92 35 29	1.900 157	426 54.9	26.6 Benne	15.0R	14.0M	
Eldon	App/Rev, 12-3-01, of MO&OS'	ADD MO	199.8 19.8	41.20	38 04 00 92 26 00	100.000 302	555 60.2	72.5	15.0R	26.2M	
Eldon	dismissal of pkt 89-120 et al as moot										
270A Eldon	AP270	APP MO	239.7 59.7	29.86 BIPH20010724ACO	38 16 49 92 34 07	2.250 174	402 58.3	29.0 Indacom	15.0R	14.9M	
Eldon											
270A Eldon	RDEL	DEL MO	241.1 61.1	31.12	38 16 49 92 35 07	6.000 102	337 58.1	28.6	15.0R	16.1M	
Eldon											
270A Eldon	ALLO	VAC MO	241.1 61.1	31.12 RM9440	38 16 49 92 35 07	6.000 102	337 58.1	28.6	15.0R	16.1M	
Eldon											
270A Eldon	AP270	APP MO	241.1 61.1	31.12 BIPH20010724ACT	38 16 49 92 35 07	0.000 -235	0 58.1	0.0 Contemporary Media Inc	15.0R	16.1M	
ERP not specified in electronically filed application for interim operation.											



CH CITY	CALL	TYPE STATE	AZI. <--	DIST FILE #	LAT. LNG.	Pwr(kw) HAAT(m)	COR(M) INT(km)	PRO(km)	Page # 7	
									LICENSEE	*IN* (Overlap in km)
219C2 KJIR.C Hannibal		CP MO	CX	24.9 157.46 204.9 BPED20030527AJE	39 41 54 91 29 48	12.000 177	361 139.7	42.8 Believers	-6.56 Broadcasting Cor	-25.00
217C1 KBIA Columbia		LIC MO	CN	1.0 52.40 181.0 BLED959	38 53 16 92 15 48	100.000 175	425 6.1	61.4 University Of Missouri	-8.43* -15.15*	
220A KNLQ.C Cuba		CP MO	ZCN	118.2 88.48 298.2 BPED19980821MD	38 02 14 91 23 04	5.000 49	353 79.2	19.4 New Life Evangelistic Cent	6.89 16.86	-10.09 -9.53
219C3 KJIR Hannibal		LIC MO	C	26.9 164.11 206.9 BLED20000505AAB	39 43 48 91 24 19	5.100 161	346 139.7	33.9 Believers	16.86 Broadcasting Cor	
221A KCVZ.C< Dixon		CP MO	CN	169.5 50.75 349.5 BPH19970527MC	37 57 59 92 10 03	6.000 92	389 6.5	27.2 Lake Area Educational	-7.55* Broa	17.08
--- Channel 220 91.9 MHz. ---										
220A KNLQ.C Cuba		CP MO	ZCN	118.2 88.48 298.2 BPED19980821MD	38 02 14 91 23 04	5.000 49	353 138.7	19.4 New Life Evangelistic Cent	-37.24 -49.46	-69.62 -55.96
219C3 KCVOFM Camdenton		LIC MO	CN	224.0 61.02 44.0 BLED19930420KE	38 01 13 92 45 27	10.000 167	402 76.8	40.2 Lake Area Educational	-49.46 -46.85*	-23.66 -58.74
221A KCVZ.C< Dixon		CP MO	CN	169.5 50.75 349.5 BPH19970527MC	37 57 59 92 10 03	6.000 92	389 82.3	27.2 Lake Area Educational	-46.85* -42.22	-21.94 -18.86
220A KNLM Marshfield		LIC MO	NCN	206.6 135.96 26.6 BLED19970505KB	37 19 09 92 57 43	3.000 84	478 137.3	22.3 New Life Evangelistic Cent	11.31 17.49	-23.66 -21.94
220A KNLM.C Marshfield		CP MO	NCX	206.6 136.27 26.6 BPED20020930AAK	37 19 01 92 57 51	1.750 95	490 137.3	20.9 New Life Evangelistic Cent		
217C1 KBIA Columbia		LIC MO	CN	1.0 52.40 181.0 BLED959	38 53 16 92 15 48	100.000 175	425 6.1	61.4 University Of Missouri	-8.43* -15.15*	
221A KMFC.C< Centralia		CP MO	CX	6.4 83.83 186.4 BPH20010118ADF	39 09 58 92 09 52	3.900 113	385 79.6	27.2 The Clair Group	-11.27 -4.22	-22.97 -18.86
221A KMFC< Centralia		LIC MO	CN	6.4 83.83 186.4 BLH19860212KG	39 09 58 92 09 52	1.850 114	386 79.6	23.1 The Clair Group		
221A KSDL< Sedalia		LIC MO	CN	293.3 90.04 113.3 BLH7620	38 43 52 93 13 32	3.000 68	335 76.6	20.2 Bick Broadcasting	9.56 -6.77	
To Channel 222A pursuant to Report and Order, MM Docket No. 99-299, released August 18, 2000 and effective October 2, 2000.										
274A KQUL< Lake Ozark		LIC MO	CN	212.0 49.85 32.0 BLH19940516KZ	38 02 06 92 34 31	6.000 114	357 58.9	30.1 Benne B/co Co. Of Lake Oza	15.0R 34.9M	
---- Channel-six TV station of concern ----										
06Z2E KMOSTV Sedalia		LI MO	HY	294.6 56.83 114.6 BLET20010926ACE	38 37 36 92 52 03	100.000 598	864 396.5	128.0 Board Of Governors Of Cent	To Grd B=	-71.16